ORIGINAL

BEFORE THE

Federal Communications Commission

WASHINGTON, D.C.

In the Matter of	)	MM Docket No. 91-58
	)	
Amendment of Section 73.202(b)	)	RM-7419
Table of Allotments	)	RM-7797
FM Broadcast Stations	)	RM-7798
(Caldwell, Texas, et al)	)	

To: The Commission

REPLY TO COMMENTS
ON BRYAN SUPPLEMENT

Bryan Broadcasting License Subsidiary, Inc. ("Bryan"), by its attorneys, hereby replies to the "Comments on Bryan Supplement" filed by Roy E. Henderson on August 24, 1999. As set forth below, Henderson's comments provide absolutely no reason why the Commission should not uphold its earlier decision and determine that Bryan's proposed upgrade of KTSR is superior to the request of Henderson for an upgrade of its station at Caldwell, Texas. If anything, the recent circumstances surrounding the FAA problems with the proposed Bryan transmitter site only serve to demonstrate the Commission's wisdom in determining that the Henderson proposal is fatally flawed.

Background

On August 17, 1999, Bryan notified the FCC of the FAA's determination that the transmitter site proposed in Bryan's application of April 19, 1999 was a presumed hazard to air navigation. The April 19 application proposed a transmitter site that would implement the upgrade of KTSR and provide full city-grade coverage to all of College Station, Texas, KTSR's city of license.

In his Comments, Henderson argues that the loss of the transmitter site proposed in Bryan's April 19 amendment demonstrates the superiority of the Henderson proposal, given that Bryan's previously specified transmitter site had not provided city-grade coverage to 8.4% of College Station. Henderson submits that his proposal, which was rejected by the Commission, places a city-grade signal over all but 4% of Caldwell, Texas, Henderson's city of license.

Discussion

Once again, Henderson attempts to confuse apples and oranges in an effort to trick the Commission into believing that his proposal and Bryan's are somehow on equal footing. In fact, nothing could be farther from the truth.

Henderson's proposal in this rulemaking proceeding is based on a transmitter site which, using standard Commission methodology, does not place a city-grade signal over any of its city of license. By using various alternative methodologies, Henderson has attempted to demonstrate that, from one specific site, it could cover all but 4% of Caldwell with a city-grade signal. This is the best anyone could possibly do, however, with the allocation as proposed; even with a specified site, using alternative methodologies, Henderson still cannot cover all of Caldwell with a city-grade signal. Moreover, despite repeatedly being faulted by the Commission for not proving the actual availability of this particular site, Henderson has never demonstrated that the FCC would even approve a tower at this site.

Bryan, in contrast, proposed an allotment with a transmitter siting area large enough that multiple sites could be identified that would provide full city-grade coverage to College Station. While it proposed a site in its April 19 amendment that was rejected by the FAA, it has today filed an amendment to its application specifying a new site, one which also provides full city-grade coverage to College Station. A copy of that amendment is attached hereto at Exhibit A.

The ability of Bryan to find an alternative transmitter site providing full city-grade coverage to its city of license demonstrates the Commission's wisdom in preferring Bryan's proposal to Henderson's alternative. While the Bryan proposal gives an applicant the flexibility to choose among a range of transmitter sites able to provide a city-grade signal to its city of license, the Henderson proposal provides no such flexibility. If Henderson's proposal were approved, that allotment would never be able to provide a city-grade signal to Caldwell -- using the alternative methods proposed by Henderson and otherwise giving him the benefit of all doubts, Henderson still does not provide a city-grade signal to his entire city of license. If the FAA were to deny approval for Henderson's site, or if the landowner were to decide not to make the property available to Henderson, or if for any number of other reasons the particular site specified by Henderson could not be used, coverage of Caldwell would only be reduced, and could quite well become non-existent, as it is today when Henderson's coverage is calculated using traditional methodology.

As Bryan has repeatedly pointed out, Commission precedent holds that an *allotment* proposal must provide for full city-grade coverage. This precedent is sound, and it must be upheld to preserve the integrity of the FM allocations system and protect it from multiple, substandard allotments. In contrast, the specification of a site at the *application* stage, where specific issues of site availability come into play, may be accorded greater flexibility.

In any event, since Bryan has located another site providing full city-grade coverage -- coverage Henderson's proposal cannot replicate no matter how hard he tries -- the issues raised by Henderson simply go away. Henderson's proposal cannot be accepted, as it contravenes the Commission's long-held policy that precludes allotments which fail to provide city-grade coverage

to their city of license. This is especially true given the existence of a competing allotment proposal which meets all FCC standards.

Conclusion

Therefore, the Commission must uphold its decision in this proceeding, grant the Bryan allotment proposal, and deny that of Henderson.

Respectfully submitted,

BRYAN BROADCASTING LICENSE SUBSIDIARY, INC.

By: Stephen J. Berman

David D. Oxenford
Stephen J. Berman

Its Attorneys

FISHER WAYLAND COOPER LEADER
& ZARAGOZA L.L.P.
2001 Pennsylvania Avenue, N.W.
Suite 400
Washington, D.C. 20006
(202) 659-3494

Dated: September 1, 1999

EXHIBIT A

FISHER WAYLAND COOPER LEADER & ZARAGOZA L.L.P.
2001 PENNSYLVANIA AVENUE, N.W.
SUITE 400
WASHINGTON, D. C. 20006-1851
TELEPHONE (202) 659-3494
FACSIMILE (202) 296-6518
WEBSITE www.fwclz.com

September 1, 1999

VIA HAND DELIVERY

Ms. Magalie Roman Salas, Secretary
Federal Communications Commission
445 12th Street, S.W., Room TW-A325
Washington, D.C. 20554

Re: Amendment to Application of KTSR(FM), College Station, Texas
For Minor Change
FCC File No. BMPH-990419IB

Dear Ms. Salas:

Bryan Broadcasting License Subsidiary, Inc., by its attorneys, hereby amends the above-referenced application for a change in the facilities of KTSR(FM), College Station, Texas, with the attached material. This amendment proposes a new transmitter site in response to an FAA determination, reported in an amendment filed August 17, 1999, that the site previously specified would be a hazard to air navigation.

Should there be any questions concerning this matter, please contact the undersigned.

Sincerely,

David D. Oxenford
Stephen J. Berman

DDO/SJB:rl

cc: Robert Buenzle, Esq.
Robert Hayne, Esq.
Greg Christopher, Esq.

AMENDMENT

Bryan Broadcasting License Subsidiary, Inc., hereby amends its pending application for a modification of the construction permit of KTSR(FM), College Station, Texas, to submit the attached engineering data, proposing a new transmitter site for the operation of KTSR(FM). This amendment is submitted to address the FAA concerns which had been identified in connection with the transmitter site previously identified by the applicant.

Bryan Broadcasting License Subsidiary, Inc.

By_____

William R. Hicks
President

Date: September 1, 1999

ENGINEERING EXHIBIT E-3

AMENDMENT TO PENDING APPLICATION
BMPH-990419IB
KTSR (FM) - COLLEGE STATION, TX

Bryan Broadcasting License Subsidiary, Inc.
College Station, TX

August 31, 1999

Prepared for: Mr. Ben Downs
Bryan Broadcasting License
Subsidiary, Inc.
P.O. Box 3248
Bryan, TX 77805

CARL E. SMITH CONSULTING ENGINEERS

2324 N. CLEVE-MASS RD., BOX 807 330/659-4440 FAX: 330/659-9234 BATH, OHIO 44210-0807

CONTENTS

CONTENTS
Cont'd

SECTION III-B FM Engineering

TECHNICAL SPECIFICATIONS

Ensure that the specifications below are accurate. Contradicting data found elsewhere in this application will be disregarded. All items must be completed. The response "on file" is not acceptable.

TECH BOX

1. Channel: 236

2. Class: ☐ A ☐ B1 ☐ B ☐ C3 ☒ C2 ☐ C1 ☐ C ☐ D

3. Antenna Location Coordinates: (NAD 27)

30 ° 45 ' 18 " ☒ N ☐ S Latitude

96 ° 24 ' 23 " ☐ E ☒ W Longitude

4. One-Step Proposal Allotment Coordinates: (NAD 27) ☒ Not applicable

____ ° ____ ' ____ " ☐ N ☐ S Latitude

____ ° ____ ' ____ " ☐ E ☐ W Longitude

5. Antenna Structure Registration Number: _____

☐ Not applicable ☒ FAA Notification Filed with FAA

6. Antenna Location Site Elevation Above Mean Sea Level: 117 meters

7. Overall Tower Height Above Ground Level: 140 meters

8. Height of Radiation Center Above Ground Level: 131 meters (H) 131 meters (V)

9. Height of Radiation Center Above Average Terrain: 150 meters (H) 150 meters (V)

10. Effective Radiated Power: 50 kW (H) 50 kW (V)

11. Maximum Effective Radiated Power: ☒ Not applicable ____ kW (H) ____ kW (V)
(Beam-Tilt Antenna ONLY)

12. Directional Antenna Relative Field Values: ☒ Not applicable (Nondirectional)

Rotation: ____ ° ☐ No rotation

Degree	Value	Degree	Value	Degree	Value	Degree	Value	Degree	Value	Degree	Value
0		60		120		180		240		300	
10		70		130		190		250		310	
20		80		140		200		260		320	
30		90		150		210		270		330	
40		100		160		220		280		340	
50		110		170		230		290		350	
Additional Azimuths											

NOTE: In addition to the information called for in this section, an explanatory exhibit providing full particulars must be submitted for each question for which a "No" response is provided.

CERTIFICATION

.UXILIARY ANTENNA APPLICANTS ARE NOT REQUIRED TO RESPOND TO ITEMS 13-16. PROCEED TO ITEM 17.

13. **Allotment.** The proposed facility complies with the allotment requirements of 47 C.F.R. Section 73.203. [X] Yes [ ] No — See Explanation in Exhibit No.

14. **Community Coverage.** The proposed facility complies with 47 C.F.R. Section 73.315. [X] Yes [ ] No — See Explanation in Exhibit No.

15. **Main Studio Location.** The proposed main studio location complies with 47 C.F.R. Section 73.1125. [X] Yes [ ] No — See Explanation in Exhibit No.

16. **Interference.** The proposed facility complies with all of the following applicable rule sections. Check all those that apply. [X] Yes [ ] No — See Explanation in Exhibit No.

Separation Requirements.

a. [X] 47 C.F.R. Section 73.207.

Grandfathered Short-Spaced.

b. [ ] 47 C.F.R. Section 73.213(a) with respect to station(s): _____ **Exhibit Required.** — Exhibit No.

c. [ ] 47 C.F.R. Section 73.213(b) with respect to station(s): _____ **Exhibit Required.** — Exhibit No.

d. [ ] 47 C.F.R. Section 73.213(c) with respect to station(s): _____ **Exhibit Required.** — Exhibit No.

Contour Protection.

e. [X] 47 C.F.R. Section 73.215 with respect to station(s): KYKR App. - BPH-9902251F **Exhibit Required.** — Exhibit No. E-3

17. **Environmental Protection Act.** The proposed facility is excluded from environmental processing under 47 C.F.R. Section 1.1306 (*i.e.*, the facility will not have a significant environmental impact and complies with the maximum permissible radiofrequency electromagnetic exposure limits for controlled and uncontrolled environments). Unless the applicant can determine compliance through the use of the RF worksheets in Appendix A, an **Exhibit is required.** [X] Yes [ ] No — See Explanation in Exhibit No. E-3

By checking "Yes" above, the applicant also certifies that it, in coordination with other users of the site, will reduce power or cease operation as necessary to protect persons having access to the site, tower or antenna from radiofrequency electromagnetic exposure in excess of FCC guidelines.

PREPARER'S CERTIFICATION ON PAGE 3 MUST BE COMPLETED AND SIGNED.

SECTION III PREPARER'S CERTIFICATION

I certify that I have prepared Section III (Engineering Data) on behalf of the applicant, and that after such preparation, I have examined and found it to be accurate and true to the best of my knowledge and belief.

Name	Relationship to Applicant (e.g., Consulting Engineer)	
Roy P. Stype, III	Consulting Engineer	
Signature Roy P. Stype, III	Date 8/31/99	
Mailing Address 2324 N. Cleveland-Massillon Road		
City Bath	State or Country (if foreign address) OH	ZIP Code 44210
Telephone Number (include area code) 330/659-4440	E-Mail Address (if available)	

WILLFUL FALSE STATEMENTS ON THIS FORM ARE PUNISHABLE BY FINE AND/OR IMPRISONMENT (U.S. CODE, TITLE 18, SECTION 1001), AND/OR REVOCATION OF ANY STATION LICENSE OR CONSTRUCTION PERMIT (U.S. CODE, TITLE 47, SECTION 312(a)(1)), AND/OR FORFEITURE (U.S. CODE, TITLE 47, SECTION 503).

Form Approved OMB No. 2120-0001

Please Type or Print on This Form

FOR FAA USE ONLY

Aeronautical Study No.

U.S. Department of Transportation
Federal Aviation Administration

Failure To Provide All Requested Information May Delay Processing of Your Notice

Notice of Proposed Construction or Alteration

1. Sponsor *(person, company, etc. proposing this action)*:
of: Mr. Ben Downs
Name: Radio Station KTSR
Address: P.O. Box 3248
City: Bryan State: TX Zip: 77805
Telephone: 409/846-1150 Fax: 409/846-1933

2. Sponsor's Representative *(if other than #1)*:
Attn. of: Roy Stype
Name: Carl E. Smith Consulting Engineers
Address: 2324 N. Cleveland-Massillion Rd.
City: Bath State: OH Zip: 44210
Telephone: 330/659-4440 Fax: 330/659-6234

3. Notice of: [X] New Construction [ ] Alteration [ ] Existing

4. Duration: [X] Permanent [ ] Temporary (____ months, ____ days)

5. Work Schedule: Beginning upon FCC granted ISD

6. Type: [X] Antenna Tower [ ] Crane [ ] Building [ ] Power Line
[ ] Landfill [ ] Water Tank [ ] Other

7. Marking/Painting and/or Lighting Preferred:
[X] Red Lights and Paint [ ] Dual - Red and Medium Intensity White
[ ] White - Medium Intensity [ ] Dual - Red and High Intensity White
[ ] White - High Intensity [ ] Other

8. FCC Antenna Structure Registration Number *(if applicable)*:
not yet registered

9. Latitude: 30 ° 45 ' 18.70 "

10. Longitude: 96 ° 24 ' 23.87 "

11. Datum: [X] NAD 83 [ ] NAD 27 [ ] Other

12. Nearest City: Bryan State: TX

13. Nearest *Public-use (not private-use)* or Military Airport or Heliport:
Coulter

14. Distance from #13. to Structure: 4.6 SM

15. Direction from #13. to Structure: NW

16. Site Elevation *(AMSL)*: 385 ft.

17. Total Structure Height *(AGL)*: 460 ft.

18. Overall Height *(#16. + #17.) (AMSL)*: 845 ft.

19. Previous FAA Aeronautical Study Number *(if applicable)*:
Supercedes 98-ASW-1884 - OE

20. Description of Location: *(Attach a USGS 7.5 minute Quadrangle Map with the precise site marked and any certified survey.)*
See Figure 5.0

21. Complete Description of Proposal:
Uniform cross section guyed steel tower with six bay FM antenna site mounted at the top.

Frequency/Power (kW)	
96.1 mHz	50 kW

Notice is required by 14 Code of Federal Regulations, part 77 pursuant to 49 U.S.C., Section 44718. Persons who knowingly and willingly violate the notice requirements of part 77 are subject to a civil penalty of $1,000 per day until the notice is received, pursuant to 49 U.S.C., Section 46301 (a).

I hereby certify that all of the above statements made by me are true, complete, and correct to the best of my knowledge. In addition, I agree to mark and/or light the structure in accordance with established marking & lighting standards as necessary.

Date	Typed or Printed Name and Title of Person Filing Notice	Signature
3/31/99	Roy P. Stype, III / Consulting Engineer	Roy P. Stype, III

ENGINEERING AFFIDAVIT

State of Ohio)
) ss:
County of Summit)

Roy P. Stype, III, being duly sworn, deposes and states that he is a graduate Electrical Engineer, a qualified and experienced Communications Consulting Engineer whose works are a matter of record with the Federal Communications Commission and that he is a member of the Firm of "Carl E. Smith Consulting Engineers" located at 2324 North Cleveland-Massillon Road in the Township of Bath, County of Summit, State of Ohio, and that the Firm has been retained by the Bryan Broadcasting License Subsidiary, Inc., to prepare the attached "Engineering Exhibit E-3."

The deponent states that the Exhibit was prepared by him or under his direction and is true of his own knowledge, except as to statements made on information and belief and as to such statements, he believes them to be true.

Roy P. Stype, III

Subscribed and sworn to before me on **August 31, 1999.**

Notary Public

/SEAL/

GAIL M. ELROD, Notary Public
Residence - Summit County
State Wide Jurisdiction, Ohio
My Commission Expires May 26, 2002

ENGINEERING STATEMENT

1.0 GENERAL

This engineering exhibit is prepared on behalf of the Bryan Broadcasting License Subsidiary, Inc., licensee of Radio Station KTSR(FM) - College Station, Texas, and permittee of construction permit BMPH-970124IA to modify the KTSR operating facilities. KTSR also has pending an application (BMPH-990419IB) to modify the above referenced construction permit. This engineering exhibit supports an amendment to this pending application and specifies a different proposed transmitter site to overcome FAA problems which have been encountered with the transmitter site originally proposed in this application.

KTSR presently operates on Channel 221A with an effective radiated power of 3 kilowatts at 84 meters above average terrain. The above referenced construction permit authorizes operation on Channel 236C2 from a different transmitter site with an effective radiated power of 50 kilowatts at 150 meters above average terrain, pursuant to the Report and Order in MM Docket 91-58. The presently pending application proposes operation on Channel 236C2 from a site located 8.5 kilometers east of he site authorized by the above referenced construction permit with an effective radiated power of 45 kilowatts at 157 meters above average terrain. Prior to filing the above referenced pending application, the licensee of KTSR engaged an airspace consultant, who determined that no problems should encountered in obtaining FAA approval for the tower originally proposed in this application. Unbeknownst to this airspace consultant, however, the FAA had adopted, but not yet published, a new GPS based instrument approach procedure for the Coulter airport, which is located within a few miles of the site originally proposed in this application. This new GPS approach procedure

would be adversely impacted by the tower presently proposed in this application. Thus, the attached amendment is submitted proposing an alternate site which will eliminate any impact on this new GPS approach, which should permit FAA approval to be granted for this proposed structure. This amendment proposes operation from a site located 5.8 kilometers east of the KTSR construction permit site with an effective radiated power of 50 kilowatts at 150 meters above average terrain.

The proposed facilities should cause no hazard whatsoever with regard to human exposure to nonionizing radiation. As outlined in Supplement A to FCC OET Bulletin 65, the worst case minimum height for a single six bay antenna operating with a total effective radiated power of 100 kilowatts is 100.1 meters to achieve compliance with the uncontrolled exposure limits outlined in the FCC exposure standard. Since the proposed antenna will be mounted at a height of 131.1 meters above ground level, the power density levels generated by the proposed facility at ground level will be well below the maximum permitted by the above standard. Furthermore, the applicant will fully comply with this FCC standard with regard to occupational exposure to nonionizing radiation by ceasing operation or reducing power when work becomes necessary on this tower in the areas where the power density levels from the proposed facility will be in excess of the permitted level for controlled exposure.

2.0 ALLOCATION CONSIDERATIONS

Channel 236 is allotted to College Station, Texas in Section 73.202(b) of the FCC Rules as a Class C2 facility. Table 2.0 is an FM allocation study showing the actual and required separations between the proposed KTSR facilities and any applicable existing or proposed stations or allotments. As shown by this table the proposed KTSR facilities will be short spaced to two facilities under the separation requirements outlined in Section 73.207 of the FCC Rules:

KLTR(CP)	Caldwell, TX	Channel 236A
KYKR(App.)	Beaumont, TX	Channel 236C

KLTR

The Report and Order in MM Docket 91-58 substituted Channel 297A for Channel 236A in Caldwell, Texas, for use by KLTR and modified the KLTR construction permit to specify operation on this channel to accommodate the allotment of Channel 236C2 to College Station, Texas. Thus, this short spacing should not be an impediment to the grant of the attached application.

KYKR

The KYKR application proposes a "one step" upgrade from Channel 236C1 to Channel 236C from a site which is short spaced to the present KTSR construction permit site and also to two other stations, pursuant to the provisions of Section 73.215 of the FCC Rules. KYKR has identified, however, an allotment reference site for Channel 236C in Beaumont, which fully complies with the spacing requirements to all other stations requiring protection consideration. As shown in Table 2.0, the proposed KTSR site complies with the spacing requirements outlined in Section 73.207 of the FCC Rules to this allotment reference site.

The short spacing to the KYKR application site is permitted under Section 73.215 of the FCC Rules so long as the required contour protection is provided. It should be noted that the separation between the proposed KTSR facilities and the KYKR application site complies with the table contained in Section 73.215(e) of the FCC Rules which specifies the minimum separation at which contour protection may be employed. Since KYKR operates on the same channel as the proposed KTSR facilities, Section 73.215(a) of the FCC Rules states that no overlap is permitted between the 40 dBu contour for the proposed KYKR facilities and the 60 dBu contour for the proposed KTSR facilities. Furthermore, there can be no overlap between the KTSR proposed 40 dBu contour and the KYKR proposed 60 dBu contour. Pursuant to Section 73.215(b)(2)(iii) of the FCC Rules, the contour projections for KYKR are based on the actual proposed operating facilities, since this application has requested processing pursuant to Section 73.215 of the FCC Rules. Terrain data from the NGDC 30 second terrain database was used in projecting the KYKR contours. Tables 2.1(a) and 2.1(b) present the contour projections for KYKR. Tables 2.2(a) and 2.2(b) present the contour projections for the proposed KTSR facilities. These contours were projected using the actual proposed operating facilities and terrain data extracted from the NGDC 30 second terrain database. Figure 2.0 shows all of these contours on an appropriate map base. As can be seen from this figure, the proposed KTSR facilities will provide the required contour protection to the facilities proposed in the KYKR application. Furthermore, as shown in Table 2.0, the proposed KTSR facilities have adequate separation from all other facilities requiring consideration.

TABLE 2.0

FM ALLOCATION STUDY - CHANNEL 236C2 (95.1 mHz) - COLLEGE STATION, TX

BRYAN BROADCASTING LICENSE SUBSIDIARY, INC.
COLLEGE STATION, TX

STUDY COORDINATES: 30/45/18 96/24/23

STATION	LOCATION	CHANNEL	CLASS	SPACING (km)	REQUIRED SPACING* (km)	NOTES
KBCT	Waco, TX	233	A	110.68	55.0	
KLDE	Houston, TX	233	C	156.63	105.0	
KAMX	Luling, TX	234	C	142.00	105.0	1
KWRDFM	Arlington, TX	235	C	210.29	188.0	
KLTR	Caldwell, TX	236	A	27.44	166.0	2,4,11
KVIC	Victoria, TX	236	C3	224.74	177.0	2
KVIC	Victoria, TX	236	C1	224.75	224.0	
KYKR	Beaumont, TX	236	C1	228.44	224.0	
KYKR	Beaumont, TX	236	C	241.64	249.0	1,7,11
KYKR	Beaumont, TX	236	C1	245.43	224.0	2
KRNH	Comfort, TX	236	C1	247.41	224.0	6
KYKR	Beaumont, TX	236	C	251.02	249.0	6
KRNH	Comfort, TX	236	C1	253.84	224.0	1,7
KRNH	Comfort, TX	236	C2	259.08	190.0	1
KFROFM	Gilmer, TX	237	C3	252.52	117.0	1
KCKR	Waco, TX	238	C	109.40	105.0	
KKMJFM	Austin, TX	238	C1	142.00	79.0	
KAFXFM	Diboll, TX	238	C1	172.56	79.0	
KCKR	Waco, TX	239	C2	112.89	58.0	1,2
KIKKFM	Houston, TX	239	C	156.63	105.0	
KHCBFM	Houston, TX	289	C	157.93	35.0	
KAJG	Centerville, TX	290	C3	76.16	17.0	

* Required Spacing Per Section 73.207 of The FCC Rules

Notes:

1 - Applied For Under Section 73.215
2 - Construction Permit
3 - Channel Deletion Proposed
4 - Move From This Channel Ordered
5 - Move to This Channel Ordered
6 - One Step Reference Site
7 - Pending Application
8 - Petition For Reconsideration
9 - Proposed Rulemaking
10 - Rulemaking Petition
11 - Short-Spaced
12 - Vacant Allotment

KYKR(APP)
60.0 dBu CONTOUR
(F(50,50) Curves Utilized)

BEARING (Degrees)		AVERAGE TERRAIN ELEVATION (meters)	ANTENNA HAAT (meters)	HORIZONTAL ERP (dBk)	(kW)	DISTANCE TO CONTOUR (km)
0.0	*	7.1	321.9	20.00	100.000	74.0
10.0		6.7	322.3	20.00	100.000	74.0
20.0		6.4	322.6	20.00	100.000	74.1
30.0		6.1	322.9	20.00	100.000	74.1
40.0		6.1	322.9	20.00	100.000	74.1
45.0	*	6.1	322.9	20.00	100.000	74.1
50.0		6.1	322.9	20.00	100.000	74.1
60.0		6.1	322.9	20.00	100.000	74.1
70.0		4.8	324.2	20.00	100.000	74.2
80.0		2.8	326.2	20.00	100.000	74.3
90.0	*	1.2	327.8	20.00	100.000	74.5
100.0		0.6	328.4	20.00	100.000	74.5
110.0		0.2	328.8	20.00	100.000	74.5
120.0		0.3	328.7	20.00	100.000	74.5
130.0		0.3	328.7	20.00	100.000	74.5
135.0	*	0.2	328.8	20.00	100.000	74.5
140.0		0.1	328.9	20.00	100.000	74.5
150.0		0.1	328.9	20.00	100.000	74.5
160.0		0.3	328.7	20.00	100.000	74.5
170.0		0.0	329.0	20.00	100.000	74.5
180.0	*	0.2	328.8	20.00	100.000	74.5
190.0		0.5	328.5	20.00	100.000	74.5
200.0		0.3	328.7	20.00	100.000	74.5
210.0		1.0	328.0	20.00	100.000	74.5
220.0		1.7	327.3	20.00	100.000	74.4
225.0	*	1.3	327.7	20.00	100.000	74.4
230.0		1.2	327.8	20.00	100.000	74.5
240.0		1.4	327.6	20.00	100.000	74.4
250.0		1.5	327.5	20.00	100.000	74.4
260.0		1.4	327.6	20.00	100.000	74.4
270.0	*	0.7	328.3	20.00	100.000	74.5
280.0		0.0	329.0	20.00	100.000	74.5
290.0		0.0	329.0	20.00	100.000	74.5
300.0		2.0	327.0	20.00	100.000	74.4
310.0		4.1	324.9	20.00	100.000	74.2
315.0	*	5.1	323.9	20.00	100.000	74.2
320.0		5.2	323.8	20.00	100.000	74.2
330.0		5.9	323.1	20.00	100.000	74.1
340.0		6.1	322.9	20.00	100.000	74.1
350.0		7.0	322.0	20.00	100.000	74.0
AVERAGE(*) =		2.7 meters				

TABLE 2.1 (a)

KYKR (APP.) 60 dBu CONTOUR

Bryan Broadcasting License Subsidiary, Inc.
College Station, TX

KYKR(APP)
40.0 dBu CONTOUR
(F(50,10) Curves Utilized)

BEARING (Degrees)	AVERAGE TERRAIN ELEVATION (meters)	ANTENNA HAAT (meters)	HORIZONTAL ERP (dBk)	HORIZONTAL ERP (kW)	DISTANCE TO CONTOUR (km)
0.0 *	7.1	321.9	20.00	100.000	174.5
10.0	6.7	322.3	20.00	100.000	174.6
20.0	6.4	322.6	20.00	100.000	174.6
30.0	6.1	322.9	20.00	100.000	174.6
40.0	6.1	322.9	20.00	100.000	174.6
45.0 *	6.1	322.9	20.00	100.000	174.6
50.0	6.1	322.9	20.00	100.000	174.6
60.0	6.1	322.9	20.00	100.000	174.6
70.0	4.8	324.2	20.00	100.000	174.8
80.0	2.8	326.2	20.00	100.000	175.1
90.0 *	1.2	327.8	20.00	100.000	175.3
100.0	0.6	328.4	20.00	100.000	175.3
110.0	0.2	328.8	20.00	100.000	175.4
120.0	0.3	328.7	20.00	100.000	175.4
130.0	0.3	328.7	20.00	100.000	175.4
135.0 *	0.2	328.8	20.00	100.000	175.4
140.0	0.1	328.9	20.00	100.000	175.4
150.0	0.1	328.9	20.00	100.000	175.4
160.0	0.3	328.7	20.00	100.000	175.4
170.0	0.0	329.0	20.00	100.000	175.4
180.0 *	0.2	328.8	20.00	100.000	175.4
190.0	0.5	328.5	20.00	100.000	175.3
200.0	0.3	328.7	20.00	100.000	175.4
210.0	1.0	328.0	20.00	100.000	175.3
220.0	1.7	327.3	20.00	100.000	175.2
225.0 *	1.3	327.7	20.00	100.000	175.3
230.0	1.2	327.8	20.00	100.000	175.3
240.0	1.4	327.6	20.00	100.000	175.2
250.0	1.5	327.5	20.00	100.000	175.2
260.0	1.4	327.6	20.00	100.000	175.2
270.0 *	0.7	328.3	20.00	100.000	175.3
280.0	0.0	329.0	20.00	100.000	175.4
290.0	0.0	329.0	20.00	100.000	175.4
300.0	2.0	327.0	20.00	100.000	175.2
310.0	4.1	324.9	20.00	100.000	174.9
315.0 *	5.1	323.9	20.00	100.000	174.8
320.0	5.2	323.8	20.00	100.000	174.8
330.0	5.9	323.1	20.00	100.000	174.7
340.0	6.1	322.9	20.00	100.000	174.6
350.0	7.0	322.0	20.00	100.000	174.5

AVERAGE(*) =	2.7 meters				

TABLE 2.1 (b)

KYKR (APP.) 40 dBu CONTOUR

Bryan Broadcasting License Subsidiary, Inc.
College Station, TX

PROPOSED KTSR
60.0 dBu CONTOUR
(F(50,50) Curves Utilized)

BEARING (Degrees)		AVERAGE TERRAIN ELEVATION (meters)	ANTENNA HAAT (meters)	HORIZONTAL ERP (dBk)	HORIZONTAL ERP (kW)	DISTANCE TO CONTOUR (km)
0.0	*	118.5	129.9	16.99	50.000	49.4
10.0		113.6	134.8	16.99	50.000	50.1
20.0		108.9	139.5	16.99	50.000	50.8
30.0		106.8	141.6	16.99	50.000	51.1
40.0		102.7	145.7	16.99	50.000	51.6
45.0	*	103.1	145.3	16.99	50.000	51.6
50.0		104.0	144.4	16.99	50.000	51.4
60.0		102.5	145.9	16.99	50.000	51.6
70.0		100.2	148.2	16.99	50.000	52.0
80.0		97.7	150.7	16.99	50.000	52.3
90.0	*	94.5	153.9	16.99	50.000	52.7
100.0		91.3	157.1	16.99	50.000	53.1
110.0		89.1	159.3	16.99	50.000	53.4
120.0		98.1	150.3	16.99	50.000	52.2
130.0		100.0	148.4	16.99	50.000	52.0
135.0	*	97.4	151.0	16.99	50.000	52.3
140.0		95.1	153.3	16.99	50.000	52.6
150.0		100.3	148.1	16.99	50.000	51.9
160.0		103.5	144.9	16.99	50.000	51.5
170.0		98.1	150.3	16.99	50.000	52.2
180.0	*	92.8	155.6	16.99	50.000	52.9
190.0		87.6	160.8	16.99	50.000	53.6
200.0		81.4	167.0	16.99	50.000	54.3
210.0		86.2	162.2	16.99	50.000	53.7
220.0		88.4	160.0	16.99	50.000	53.5
225.0	*	87.9	160.5	16.99	50.000	53.5
230.0		86.9	161.5	16.99	50.000	53.6
240.0		82.9	165.5	16.99	50.000	54.1
250.0		79.3	169.1	16.99	50.000	54.5
260.0		81.7	166.7	16.99	50.000	54.2
270.0	*	85.0	163.4	16.99	50.000	53.9
280.0		88.8	159.6	16.99	50.000	53.4
290.0		92.8	155.6	16.99	50.000	52.9
300.0		99.5	148.9	16.99	50.000	52.0
310.0		106.5	141.9	16.99	50.000	51.1
315.0	*	108.5	139.9	16.99	50.000	50.8
320.0		108.4	140.0	16.99	50.000	50.8
330.0		113.9	134.5	16.99	50.000	50.0
340.0		116.6	131.8	16.99	50.000	49.7
350.0		120.2	128.2	16.99	50.000	49.2

AVERAGE(*) =		98.5	meters			

TABLE 2.2 (a)

PROPOSED KTSR 60 dBu CONTOUR

Bryan Broadcasting License Subsidiary, Inc.
College Station, TX

PROPOSED KTSR
40.0 dBu CONTOUR
(F(50,10) Curves Utilized)

BEARING (Degrees)		AVERAGE TERRAIN ELEVATION (meters)	ANTENNA HAAT (meters)	HORIZONTAL ERP (dBk)	HORIZONTAL ERP (kW)	DISTANCE TO CONTOUR (km)
0.0	*	118.5	129.9	16.99	50.000	135.0
10.0		113.6	134.8	16.99	50.000	135.6
20.0		108.9	139.5	16.99	50.000	136.3
30.0		106.8	141.6	16.99	50.000	136.6
40.0		102.7	145.7	16.99	50.000	137.1
45.0	*	103.1	145.3	16.99	50.000	137.1
50.0		104.0	144.4	16.99	50.000	137.0
60.0		102.5	145.9	16.99	50.000	137.2
70.0		100.2	148.2	16.99	50.000	137.5
80.0		97.7	150.7	16.99	50.000	137.8
90.0	*	94.5	153.9	16.99	50.000	138.2
100.0		91.3	157.1	16.99	50.000	138.7
110.0		89.1	159.3	16.99	50.000	139.0
120.0		98.1	150.3	16.99	50.000	137.8
130.0		100.0	148.4	16.99	50.000	137.5
135.0	*	97.4	151.0	16.99	50.000	137.8
140.0		95.1	153.3	16.99	50.000	138.2
150.0		100.3	148.1	16.99	50.000	137.5
160.0		103.5	144.9	16.99	50.000	137.0
170.0		98.1	150.3	16.99	50.000	137.8
180.0	*	92.8	155.6	16.99	50.000	138.5
190.0		87.6	160.8	16.99	50.000	139.2
200.0		81.4	167.0	16.99	50.000	140.0
210.0		86.2	162.2	16.99	50.000	139.4
220.0		88.4	160.0	16.99	50.000	139.1
225.0	*	87.9	160.5	16.99	50.000	139.1
230.0		86.9	161.5	16.99	50.000	139.3
240.0		82.9	165.5	16.99	50.000	139.8
250.0		79.3	169.1	16.99	50.000	140.3
260.0		81.7	166.7	16.99	50.000	140.0
270.0	*	85.0	163.4	16.99	50.000	139.5
280.0		88.8	159.6	16.99	50.000	139.0
290.0		92.8	155.6	16.99	50.000	138.5
300.0		99.5	148.9	16.99	50.000	137.6
310.0		106.5	141.9	16.99	50.000	136.6
315.0	*	108.5	139.9	16.99	50.000	136.3
320.0		108.4	140.0	16.99	50.000	136.4
330.0		113.9	134.5	16.99	50.000	135.6
340.0		116.6	131.8	16.99	50.000	135.2
350.0		120.2	128.2	16.99	50.000	134.7
AVERAGE(*) =		98.5	meters			

TABLE 2.2 (b)

PROPOSED KTSR 40 dBu CONTOUR

Bryan Broadcasting License Subsidiary, Inc.
College Station, TX

PROPOSED KTSR 60 dBu

KYKR (APP.) 40 dBu

PROPOSED KTSR CHANNEL 236C2

KYKR (APP.) 60 dBu

PROPOSED KTSR 40 dBu

KYKR (APP.) CHANNEL 236C

94°

31°

96°

30°

HOUSTON

PORT ARTHUR

CARL E. SMITH CONSULTING ENGINEERS
2324 N. CLEVE-MASS RD., BOX 807
BATH, OHIO 44210-0807
330/659-4440

FIG. 2.0

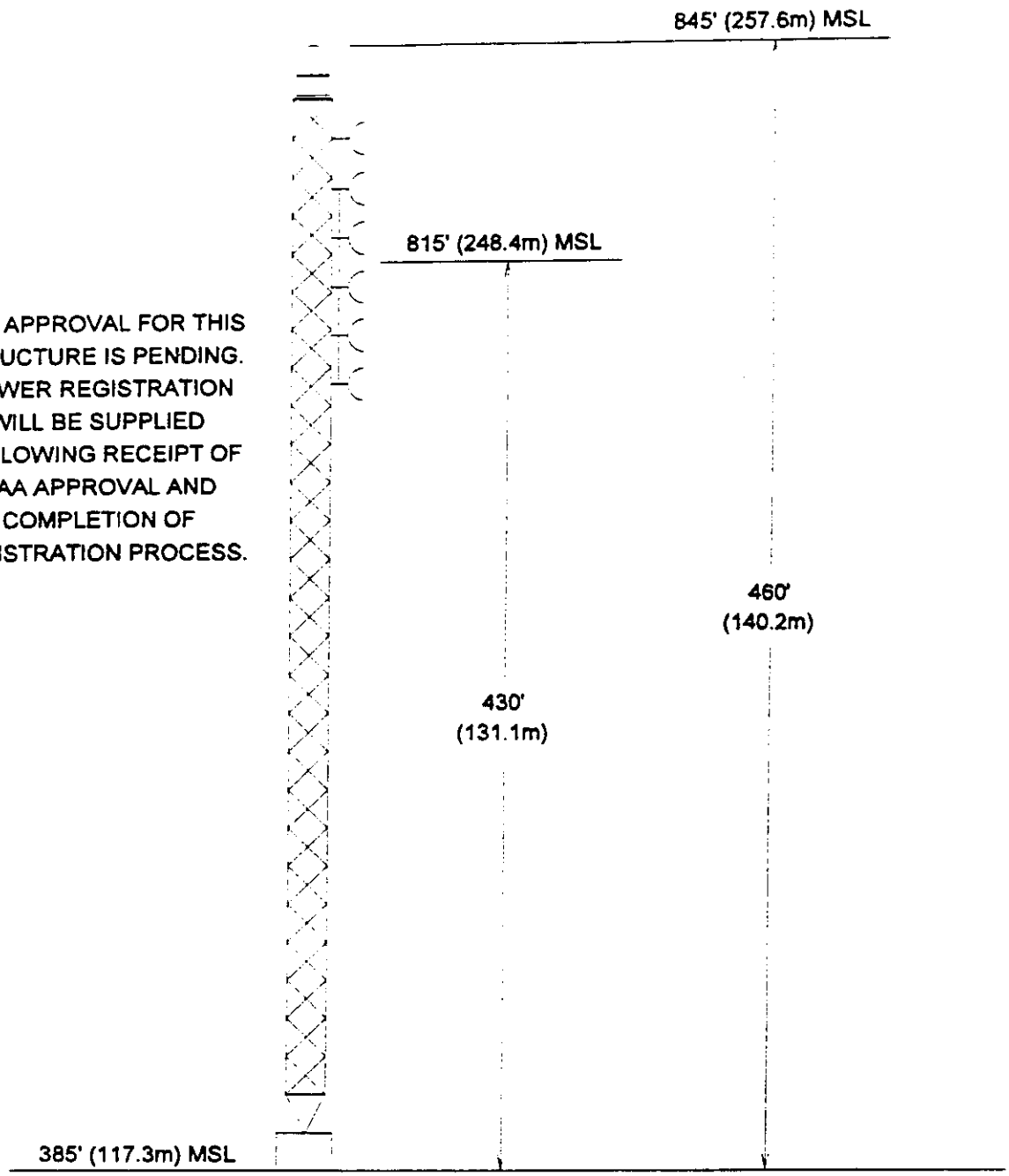
DETAILED ALLOCATION STUDY

Bryan Broadcasting License Subsidiary, Inc.
College Station, TX

3.0 PROPOSED ANTENNA SYSTEM

The proposed antenna will be a six bay circularly polarized antenna that will be side mounted near the top of a proposed new tower that will stand 140.2 meters above ground level. Figure 3.0 is a vertical plan view of the proposed installation.

BBLS/VP1 8/30/99



FAA APPROVAL FOR THIS STRUCTURE IS PENDING. TOWER REGISTRATION WILL BE SUPPLIED FOLLOWING RECEIPT OF FAA APPROVAL AND COMPLETION OF REGISTRATION PROCESS.

NOT TO SCALE

NL - 30° 45' 18"

WL - 96° 24' 23"

CARL E. SMITH CONSULTING ENGINEERS
2324 N. CLEVE-MASS., RD. BOX 807
BATH, OHIO 44210-0807
(330) 659-4440

FIG. 3.0

VERTICAL PLAN VIEW

BRYAN BROADCASTING LICENSE
SUBSIDIARY, INC
COLLEGE STATION, TX

4.0 PROPOSED SERVICE CONTOURS

The KTSR proposed 3.16 mV/m contour is presented in Table 4.0. Likewise the proposed 1 mV/m contour is tabulated in Table 4.1. To insure sufficient detail, these contours were projected at azimuth intervals of no more than ten degrees. The average elevation of each radial was extracted from the NGDC 30 second terrain database. Only the eight cardinal radials, however, were used to calculate the overall height above average terrain. Using these average elevations, the contours were computed as specified by Section 73.313 of the FCC Rules. These contours are shown on an appropriate map base in relation to the College Station city limits in Figure 4.0. As can be seen from this figure, the proposed 3.16 mV/m (city grade) contour will encompass all of College Station, as required by Section 73.315(a) of the FCC Rules.

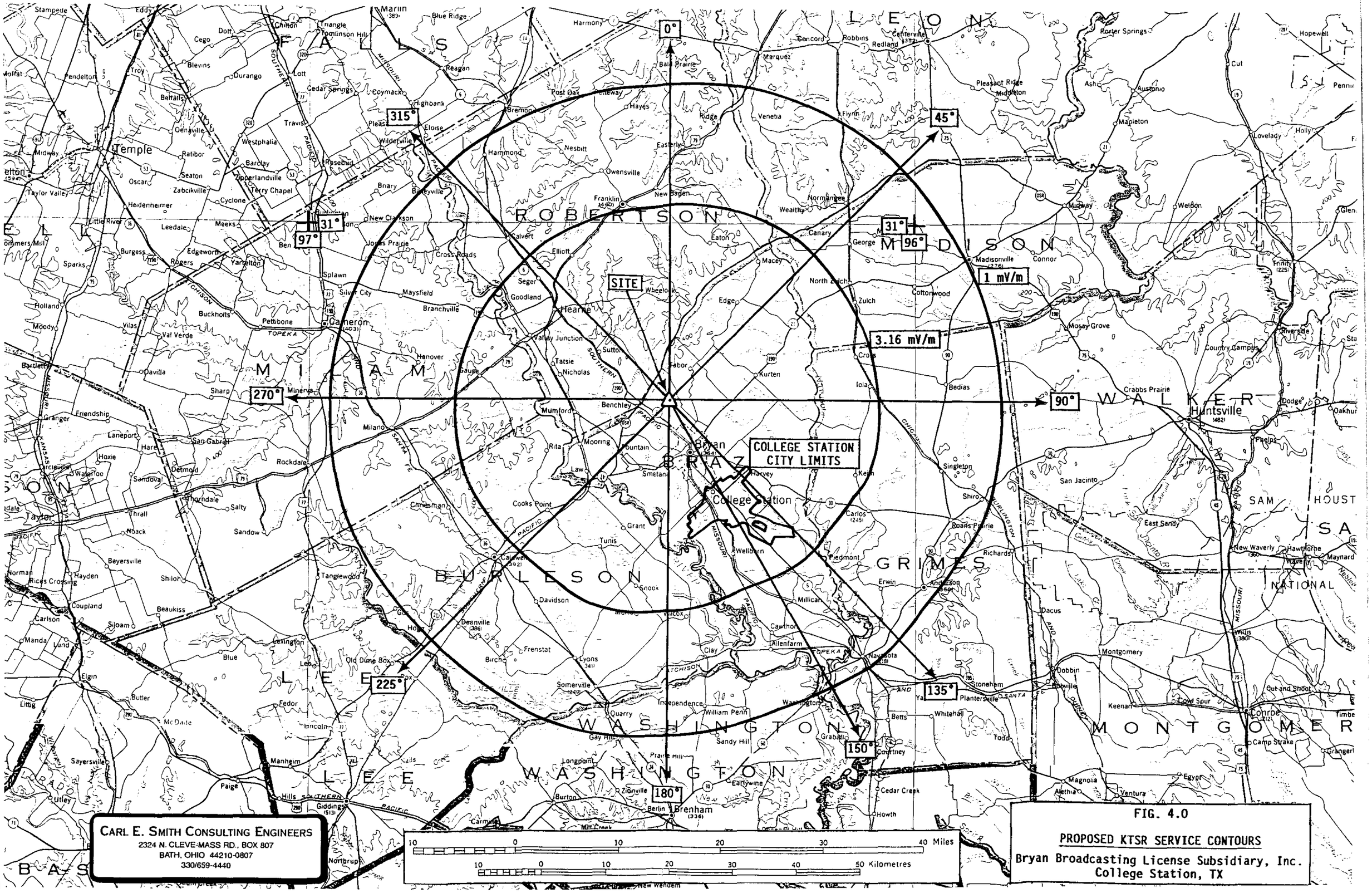


FIG. 4.0

PROPOSED KTSR SERVICE CONTOURS

Bryan Broadcasting License Subsidiary, Inc.
College Station, TX

PROPOSED KTSR
70.0 dBu CONTOUR
(F(50,50) Curves Utilized)

BEARING (Degrees)		AVERAGE TERRAIN ELEVATION (meters)	ANTENNA HAAT (meters)	HORIZONTAL ERP (dBk)	(kW)	DISTANCE TO CONTOUR (km)
0.0	*	118.5	129.9	16.99	50.000	30.4
10.0		113.6	134.8	16.99	50.000	30.9
20.0		108.9	139.5	16.99	50.000	31.4
30.0		106.8	141.6	16.99	50.000	31.7
40.0		102.7	145.7	16.99	50.000	32.1
45.0	*	103.1	145.3	16.99	50.000	32.1
50.0		104.0	144.4	16.99	50.000	32.0
60.0		102.5	145.9	16.99	50.000	32.2
70.0		100.2	148.2	16.99	50.000	32.4
80.0		97.7	150.7	16.99	50.000	32.7
90.0	*	94.5	153.9	16.99	50.000	33.0
100.0		91.3	157.1	16.99	50.000	33.4
110.0		89.1	159.3	16.99	50.000	33.6
120.0		98.1	150.3	16.99	50.000	32.6
130.0		100.0	148.4	16.99	50.000	32.4
135.0	*	97.4	151.0	16.99	50.000	32.7
140.0		95.1	153.3	16.99	50.000	33.0
150.0		100.3	148.1	16.99	50.000	32.4
160.0		103.5	144.9	16.99	50.000	32.0
170.0		98.1	150.3	16.99	50.000	32.6
180.0	*	92.8	155.6	16.99	50.000	33.2
190.0		87.6	160.8	16.99	50.000	33.8
200.0		81.4	167.0	16.99	50.000	34.4
210.0		86.2	162.2	16.99	50.000	33.9
220.0		88.4	160.0	16.99	50.000	33.7
225.0	*	87.9	160.5	16.99	50.000	33.8
230.0		86.9	161.5	16.99	50.000	33.9
240.0		82.9	165.5	16.99	50.000	34.3
250.0		79.3	169.1	16.99	50.000	34.7
260.0		81.7	166.7	16.99	50.000	34.4
270.0	*	85.0	163.4	16.99	50.000	34.1
280.0		88.8	159.6	16.99	50.000	33.7
290.0		92.8	155.6	16.99	50.000	33.2
300.0		99.5	148.9	16.99	50.000	32.5
310.0		106.5	141.9	16.99	50.000	31.7
315.0	*	108.5	139.9	16.99	50.000	31.5
320.0		108.4	140.0	16.99	50.000	31.5
330.0		113.9	134.5	16.99	50.000	30.9
340.0		116.6	131.8	16.99	50.000	30.6
350.0		120.2	128.2	16.99	50.000	30.3
AVERAGE(*) =		98.5 meters				

TABLE 4.0

PROPOSED KTSR 3.16 mV/m CONTOUR

Bryan Broadcasting License Subsidiary, Inc.
College Station, TX

PROPOSED KTSR
60.0 dBu CONTOUR
(F(50,50) Curves Utilized)

BEARING (Degrees)		AVERAGE TERRAIN ELEVATION (meters)	ANTENNA HAAT (meters)	HORIZONTAL ERP (dBk)	HORIZONTAL ERP (kW)	DISTANCE TO CONTOUR (km)
0.0	*	118.5	129.9	16.99	50.000	49.4
10.0		113.6	134.8	16.99	50.000	50.1
20.0		108.9	139.5	16.99	50.000	50.8
30.0		106.8	141.6	16.99	50.000	51.1
40.0		102.7	145.7	16.99	50.000	51.6
45.0	*	103.1	145.3	16.99	50.000	51.6
50.0		104.0	144.4	16.99	50.000	51.4
60.0		102.5	145.9	16.99	50.000	51.6
70.0		100.2	148.2	16.99	50.000	52.0
80.0		97.7	150.7	16.99	50.000	52.3
90.0	*	94.5	153.9	16.99	50.000	52.7
100.0		91.3	157.1	16.99	50.000	53.1
110.0		89.1	159.3	16.99	50.000	53.4
120.0		98.1	150.3	16.99	50.000	52.2
130.0		100.0	148.4	16.99	50.000	52.0
135.0	*	97.4	151.0	16.99	50.000	52.3
140.0		95.1	153.3	16.99	50.000	52.6
150.0		100.3	148.1	16.99	50.000	51.9
160.0		103.5	144.9	16.99	50.000	51.5
170.0		98.1	150.3	16.99	50.000	52.2
180.0	*	92.8	155.6	16.99	50.000	52.9
190.0		87.6	160.8	16.99	50.000	53.6
200.0		81.4	167.0	16.99	50.000	54.3
210.0		86.2	162.2	16.99	50.000	53.7
220.0		88.4	160.0	16.99	50.000	53.5
225.0	*	87.9	160.5	16.99	50.000	53.5
230.0		86.9	161.5	16.99	50.000	53.6
240.0		82.9	165.5	16.99	50.000	54.1
250.0		79.3	169.1	16.99	50.000	54.5
260.0		81.7	166.7	16.99	50.000	54.2
270.0	*	85.0	163.4	16.99	50.000	53.9
280.0		88.8	159.6	16.99	50.000	53.4
290.0		92.8	155.6	16.99	50.000	52.9
300.0		99.5	148.9	16.99	50.000	52.0
310.0		106.5	141.9	16.99	50.000	51.1
315.0	*	108.5	139.9	16.99	50.000	50.8
320.0		108.4	140.0	16.99	50.000	50.8
330.0		113.9	134.5	16.99	50.000	50.0
340.0		116.6	131.8	16.99	50.000	49.7
350.0		120.2	128.2	16.99	50.000	49.2

AVERAGE(*) =		98.5	meters			

TABLE 4.1

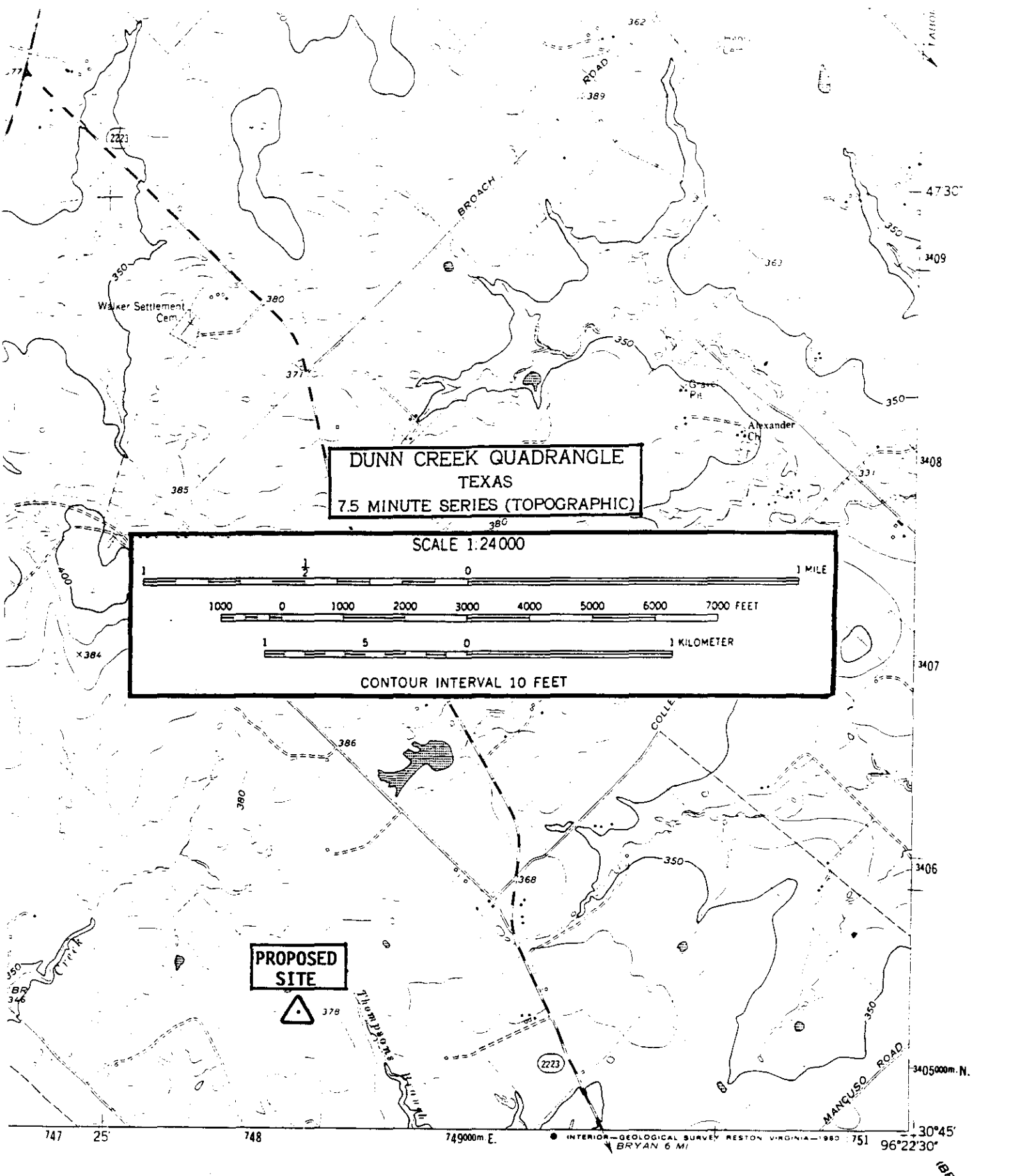
PROPOSED KTSR 1 mV/m CONTOUR

Bryan Broadcasting License Subsidiary, Inc.
College Station, TX

5.0 PROPOSED SITE

Figure 5.0 is a topographic map showing the location of the proposed site. There are no AM broadcast facilities located within 3.2 kilometers of this site. Nor are there any FM, TV, or nonbroadcast radio facilities located within the immediate vicinity of this site which would be impacted by the construction and operation of the proposed facility.

Application has been made to the FAA for the proposed construction. A copy of this application is included as a part of this engineering exhibit. Upon the receipt of FAA approval, this proposed tower will be registered under the FCC's Antenna Structure Registration program and the registration number will be supplied as an amendment to this application.



1 MILE

CARL E. SMITH CONSULTING ENGINEERS
2324 N. CLEVE-MASS RD., BOX 807
BATH, OHIO 44210-0807
330/659-4440

FIG. 5.0

TOPOGRAPHIC MAP
SHOWING PROPOSED SITE

Bryan Broadcasting License Subsidiary, Inc.
College Station, TX

6.0 MULTIPLE OWNERSHIP CONSIDERATIONS

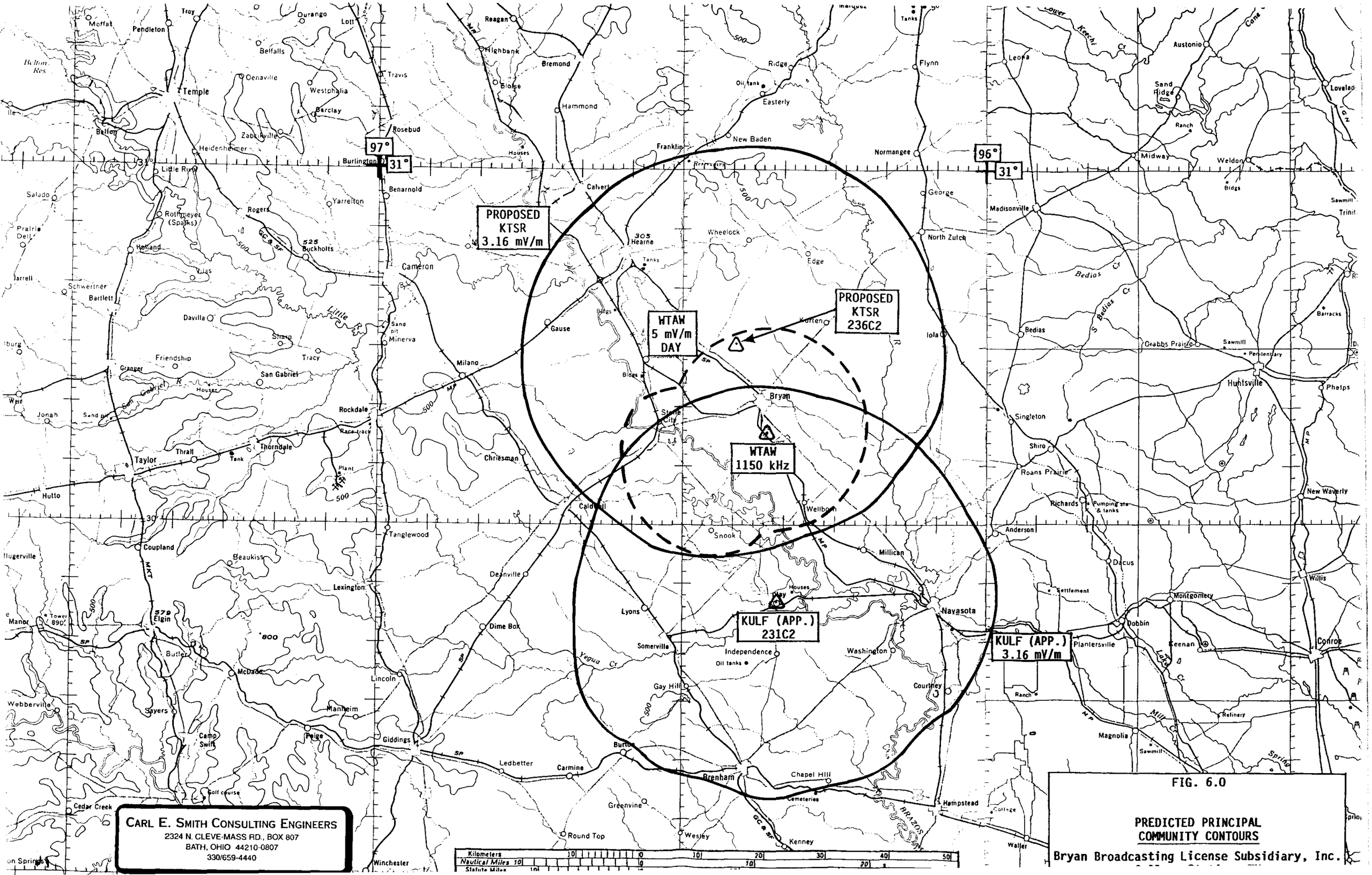
KTSR has attributable common ownership with WTAW(AM) - College Station, Texas, KULF(FM) - Brenham, Texas, and the facilities authorized by the construction permit for KAZW(AM) - College Station, Texas. KAZW is authorized to operate on 1620 kHz as an expanded band facility paired with and commonly owned with WTAW. Thus, pursuant to Note 9 to Section 73.3555 of the FCC Rules, the facilities authorized by the KAZW construction permit need not be considered as a commonly owned station in the analysis to determine that the common ownership of these four stations will comply with Section 73.3555 of the FCC Rules.

KULF is presently licensed to operate on Channel 231A and holds a construction permit to operate on Channel 231C3. An application (BMPH-990405IA) is also pending to modify the KULF construction permit to specify operation on Channel 231C2, pursuant to the FCC's "one step" upgrade rules. The proposed KTSR operating facilities will not have principal community contour overlap with either the licensed operation of KULF or the facilities authorized by the KULF construction permit. Principal community contour overlap will occur, however, between the facilities proposed in the KULF application and the modified KTSR facilities proposed herein.

Figure 6.0 is a map exhibit depicting the predicted principal community contours for WTAW, the proposed operation of KTSR, and the proposed operation of KULF. The WTAW 5 mV/m daytime contour was projected using the notified daytime facilities from the FCC's AM engineering database and conductivity data extracted from FCC Figure M3. The 3.16 mV/m contour for the proposed operation of KULF was projected using the proposed facilities and terrain data extracted from the NGDC 30 second terrain database. The proposed KTSR principal community contour was based on the

facilities proposed in the attached amendment and was also projected utilizing terrain data extracted from the NGDC 30 second terrain database. As shown by this figure, the principal community contour for the proposed KTSR facilities will overlap the principal community contours of WTAW and the proposed operation of KULF.

Figure 6.1 shows the composite principal community contour for these three stations. Also shown in this figure are the transmitter sites of all operating commercial stations located within this contour. Table 6.1 is a tabulation of the stations depicted in this figure. As shown by this data, there are 15 stations, including WTAW, the proposed operation of KULF, and the proposed operation of KTSR whose transmitter sites lie within this contour. Since it is obvious that the principal community contour of any station whose site is located within this contour will overlap this contour, it can be safely said that there are at least 15 stations in the market defined by these three stations. In fact, this number would be even higher if stations located outside this contour but whose principal community contours overlap this composite contour were included. No such further analysis is necessary in this case, however, since, in markets containing 15 to 29 stations, Section 73.3555(a)(1)(iii) of the FCC Rules permits common ownership of up to six stations, not more than four of which are in the same service. The instant situation involves the common ownership of one AM station and two FM stations, which does not exceed the permitted maximum. Thus, the proposed modified KTSR operating facilities will fully comply with Section 73.3555 of the FCC Rules.

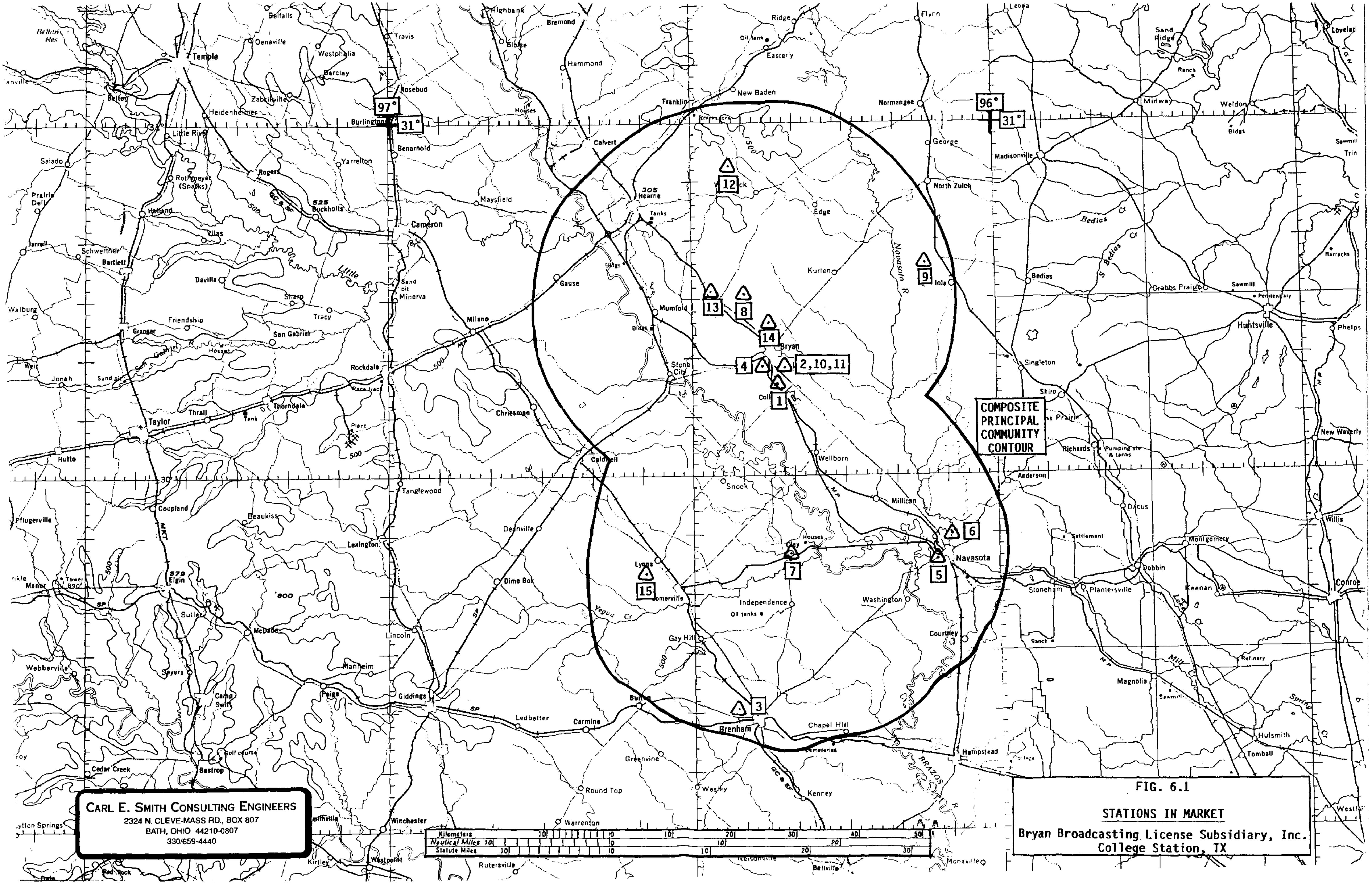


CARL E. SMITH CONSULTING ENGINEERS
2324 N. CLEVE-MASS RD., BOX 807
BATH, OHIO 44210-0807
330/659-4440

FIG. 6.0

PREDICTED PRINCIPAL
COMMUNITY CONTOURS

Bryan Broadcasting License Subsidiary, Inc.



CARL E. SMITH CONSULTING ENGINEERS
2324 N. CLEVE-MASS RD., BOX 807
BATH, OHIO 44210-0807
330/659-4440

FIG. 6.1

STATIONS IN MARKET

Bryan Broadcasting License Subsidiary, Inc.
College Station, TX

TABLE 6.1

STATIONS IN MARKET
Bryan Broadcasting License Subsidiary, Inc.
College Station, TX

Station	Call	Frequency/ Channel	Location
1	WTAW	1150	College Station, TX
2	KTAM	1240	Bryan, TX
3	KWHI	1280	Brenham, TX
4	KAGC	1510	Bryan, TX
5	KWBC	1550	Navasota, TX
6	KMBV	223A	Navasota, TX
7	KULF(App.)	231C2	Brenham, TX
8	KTSR(Prop.)	236C2	College Station, TX
9	KAGG	241C2	Madisonville, TX
10	KORA-FM	252A	Bryan, TX
11	KBMA	258A	Bryan, TX
12	KZTR	270C3	Franklin, TX
13	KVJM	276A	Hearne, TX
14	KKYS	284C2	Bryan, TX
15	KTTX	291C2	Brenham, TX

CERTIFICATE OF SERVICE

I, Rhea Lytle, do hereby certify that I have this 1st day of September, 1999, mailed by first-class United States mail, postage prepaid, copies of the foregoing "**Reply to Comments on Bryan Supplement**" to the following:

Christopher Wright, Esq.*
Office of the General Counsel
Federal Communications Commission
445 12th Street, S.W., Room 8-C755
Washington, D.C. 20554

Gregory M. Christopher, Esq.*
Office of the General Counsel
Federal Communications Commission
445 12th Street, S.W., Room 8-A814
Washington, D.C. 20554

Robert Hayne, Esq.*
Federal Communications Commission
Mass Media Bureau, Allocations Branch
445 12th Street, S.W., Room 3-A262
Washington, D.C. 20554

Robert J. Buenzle, Esq.
Law Offices of Robert J. Buenzle
12110 Sunset Hills Road, Suite 450
Reston, VA 20190

Christopher Sprigman, Esq.
U.S. Department of Justice
Antitrust Division
Appellate Section, Room 10535
Patrick Henry Building
601 D Street, N.W.
Washington, D.C. 20530

Meredith S. Senter, Esq.
Leventhal, Senter & Lerman, P.L.L.C.
2000 K Street, N.W., Suite 600
Washington, D.C. 20006-1809

Judith A. Mather, Esq.
Dow, Lohnes & Albertson, P.L.L.C.
1200 New Hampshire Avenue, N.W.
Washington, D.C. 20036-6802

Rhea Lytle

Rhea Lytle

***Hand Delivery**